

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

AUG 24 2021

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEFFREY BRENT THOMAS,

Defendant.

PATRICK KEANEY
Clerk, U.S. District Court

By _____ Deputy Clerk

Case No.

CR 21-290 - RAW

INDICTMENT

The Federal Grand Jury charges:

COUNT ONE

AGGRAVATED SEXUAL ABUSE IN INDIAN COUNTRY
[18 U.S.C. §§ 2241(c), 2246(2)(D), 1151 & 1153]

Between on or about January 1, 2020 and March 19, 2020, within the Eastern District of Oklahoma, in Indian Country, the defendant, **JEFFREY BRENT THOMAS**, an Indian, did knowingly cause and attempt to cause C.J., a person who had not attained the age of 12 years, to engage in a sexual act as defined in Title 18, United States Code, Section 2246, to wit: intentional touching, directly and not through the clothing of the genitalia of C.J. with an intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person, in violation of Title 18, United States Code, Sections 2241(c), 2246(2)(D), 1151 and 1153.

COUNT TWO

AGGRAVATED SEXUAL ABUSE IN INDIAN COUNTRY
[18 U.S.C. §§ 2241(c), 2246(2)(D), 1151 & 1153]

Between on or about March 21, 2020 and January 15, 2021, within the Eastern District of Oklahoma, in Indian Country, the defendant, **JEFFREY BRENT THOMAS**, an Indian, did knowingly cause and attempt to cause C.J., a person who had not attained the age of 12 years, to

engage in a sexual act as defined in Title 18, United States Code, Section 2246, to wit: intentional touching, directly and not through the clothing of the genitalia of C.J. with an intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person, in violation of Title 18, United States Code, Sections 2241(c), 2246(2)(D), 1151 and 1153.

COUNT THREE

AGGRAVATED SEXUAL ABUSE IN INDIAN COUNTRY
[18 U.S.C. §§ 2241(c), 2246(2)(D), 1151 & 1153]

On or about January 16, 2021, within the Eastern District of Oklahoma, in Indian Country, the defendant, **JEFFREY BRENT THOMAS**, an Indian, did knowingly cause and attempt to cause C.J., a person who had not attained the age of 12 years, to engage in a sexual act as defined in Title 18, United States Code, Section 2246, to wit: intentional touching, directly and not through the clothing of the genitalia of C.J. with an intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person, in violation of Title 18, United States Code, Sections 2241(c), 2246(2)(D), 1151 and 1153.

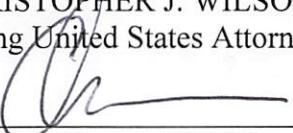
COUNT FOUR

ABUSIVE SEXUAL CONTACT IN INDIAN COUNTRY
[18 U.S.C. §§ 2244(a)(5), 2246(3), 1151 & 1153]

Between on or about January 1, 2020 and January 16, 2021, within the Eastern District of Oklahoma, in Indian Country, the defendant, **JEFFREY BRENT THOMAS**, an Indian, did knowingly engage in and cause sexual contact as defined in Title 18, United States Code, Section 2246, to wit: intentionally touching, directly and through the clothing, the buttocks of C.J., who had not attained the age of 12 years, with an intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person, in violation of Title 18, United States Code, Sections 2244(a)(5), 2246(3), 1151 and 1153.

A TRUE BILL:

CHRISTOPHER J. WILSON
Acting United States Attorney



ANTHONY C. MAREK
State Bar of Michigan #P76767
Assistant United States Attorney

Pursuant to the E-Government Act,
the original indictment has been filed
under seal in the Clerk's Office.

s / Foreperson
FOREPERSON OF THE GRAND JURY